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August 6, 2001

Mary McAuliffe
Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Re: Metropolitan Council Supplemental Environmental Project

Dear Mary:

I have enclosed a draft of Appendix C to our Consent Decree, detailing the revised Supplemental Environmental Project for Metropolitan Council's Wastewater Treatment Plant. As you know, the goal of our Supplemental Environmental Project is to enhance the particulate removal from the Wastewater Treatment Plant incinerator. The project as originally proposed would involve the addition of a dry electrostatic precipitator ("dry ESP") to the pollution control train of one of the new fluidized bed incinerators at the plant.

Our engineering reports conclude that substituting fabric filter technology in the pollution control train will provide the same or slightly better particulate removal capability as dry ESP, estimated at 3.5 tons of PM/PM-10 per year. The cost of fabric filter technology is expected to approximate the \$1.6 million (in 1998 dollars) that the dry ESP would cost.

In addition, fabric filter technology would provide the additional benefit of increased mercury reductions. Fabric filters, preceded by carbon injection, should provide up to 90 percent mercury removal, compared with 70 percent for the dry electrostatic precipitator.

We understand that the Department of Justice will be drafting the appropriate motion to facilitate this revision.

Sincerely,



Robert E. Cattanach

Enclosure

APPENDIX C
United States v. Metropolitan Council

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Met Council proposes to add a fabric filter ("FF") to the air pollution control train of one of the new fluidized bed incinerators at the Met WWTP.

A base air pollution control train comprised of a wet scrubber followed by a wet ESP is required for removing particulate matter (both PM and PM-10) from the flue gases emitted from a fluidized bed incinerator. The wet scrubber will primarily remove PM/PM10 and acid gases while the wet ESP will remove particulate matter and the heavy metals that exist as condensable oxides and salts. The FF will be added ahead of the wet scrubber in the air pollution control train to provide enhanced particulate removal.

In the FF, flue gas is passed through a fabric, causing PM to be collected on the fabric by sieving or other mechanisms. During operation, a dust cake also forms on the filter from the collected PM and significantly increases collection efficiency. Particles are collected on the fabric and drop into a hopper below the unit. Pulse-jet cleaning with a short burst of high pressure air also is used to dislodge the dust cake from the fabric.

This SEP will result in a significant net environmental benefit. The FF will result in a significant additional reduction in PM/PM-10 emissions from the incinerator. While the actual reduction will vary depending on actual sludge throughput in the incinerator, the maximum additional reduction is projected to be approximately 3.5 tons of PM/PM-10 per year, based on design capacity. The combination of the FF and the wet scrubber/wet ESP effectively will achieve among the highest level of PM/PM-10 emissions reduction feasible.

The FF will be installed in conjunction with the construction of the fluidized bed incinerator. The FF will be operational at the startup of the incinerator. The estimated cost of adding the FF to an incinerator air pollution control train is in excess of \$1.6 million (as measured by 1998 dollars).

Met Council hereby represents that the FF is not required by NSPS regulations or Minnesota SIP performance requirements.

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July 27, 2001

VIA FACSIMILE AND POSTAL SERVICE

Mary McAulifee
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Re: Metropolitan Council Meeting Agenda

Dear Mary:

I enclose a copy of the agenda for Metropolitan Council's meeting with EPA on July 30, 2001. Please call me if you have any questions.

Sincerely,



Robert M. Cattanach

WW:nrm
Enclosure

Metropolitan Wastewater Treatment Plant
Consent Decree Status Meeting
US EPA/Metropolitan Council
July 30, 2001
Agenda

- Introductions and Agenda Review
- Damper Openings
 - overview
 - causes
 - solutions
 - trend lines
- SEP Change
 - outline of proposal
 - general environmental benefits
 - < 3 micron concerns
- FBI Update
- Other

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